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*01 MAR 9 PM General Counsel

March 9, 2001 OFFICE OF 1815214 6301 EXECUTIVE SECREPTARY 7406

VIA HAND DELIVERY

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re: Petition to Convene a Contested Case Proceeding to Establish

"Permanent Prices" for Interconnection and Unbundled Network

Elements

Docket No. 97-01262

Re: BST UNE Tariff Filing

Docket No. 01-00205

Dear Mr. Waddell:

Following further analysis of our CLEC tariff filing on March 2, 2001, BellSouth believes the following information will assist the Authority in reviewing the tariff.

- Although the worksheet provided by the Directors as Exhibit A to the Final Order dated February 23, 2001 did not indicate that Elements D.5.1, D.5.2 and D.5.3 should be de-averaged, it appears to BellSouth that they should be. Attached is a revised rate sheet which includes de-averaged rates for those elements.
- 2. Pursuant to FCC Rule 319(f), BellSouth is no longer required to unbundle OS/DA where it provides CLECs "with customized routing or a compatible signaling protocol." 47 C.F.R. § 319(f). BellSouth provides various methods of customized routing consistent with the requirements of the FCC and therefore did not file rates for Elements G.O and G.1-G8.

- 3. The non-recurring rate Element H.O Voice Grade Circuits were incorrectly stated as \$769.08 and \$7.69 as a result of a typographical error. Those rates should have been \$768.08 and \$7.68. Those rates are corrected on the attached rate sheet.
- 4. BellSouth has not included interim number portability rate elements I.0 through I.5 because BellSouth has implemented long-term number portability throughout Tennessee. According to the FCC, ILECs "must discontinue using transitional number portability measures in areas where a long-term number portability method has been implemented." 47 C.F.R. § 52.27(d); Telephone Number Portability, CC Docket No. 96-115, Second Memorandum and Opinion and Order on Reconsideration, 13 FCC Rcd 21.204 at ¶ 16 (1998).

Thank you for your attention to these matters.

Hery truly yours,

Guy M. Hicks

GMH:ch Enclosure

CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2001, a copy of the foregoing document was served on the parties of record as indicated:

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